

KENNER LAW FIRM APC  
DAVID E. KENNER, CSB 41425  
ATTORNEY AT LAW  
16633 VENTURA BOULEVARD, SUITE 735  
ENCINO, CALIFORNIA 91436  
TELEPHONE: 818-995-1195  
FAX: 818-475-5369

Attorney for Defendant, *Shalom Ifrah*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHALOM, IFRAH

Defendant

Case No.2:22-CR-0046-WBS

STIPULATION TO ALLOW  
DEFENDANT SHALOM IFRAH  
TO TRAVEL TO AND FROM TEL  
AVIV ISREAL; DECLARATION  
OF DAVID KENNER; AIRLINE  
TICKETS ATTACHED AS  
EXHIBIT A ORDER LODGED  
HEREWITH

IT IS HEREBY STIPULATED by and between Michele Beckwith, United States Attorney, by and through Roger Yang, Assistant United States Attorney, attorney for Plaintiff, and David E. Kenner, attorney for Defendant Shalom Ifrah, that the defendant may travel to and from Tel Aviv Israel on September 18, 2025, returning on October 16, 2025. It is further requested that Mr. Ifrah may pick-up his US Passport and Israeli Passport from Pretrial Services within 48 hours of his departure, returning it within 24 hours of his return.

'DECLARATION OF DAVID E. KENNER

David E. Kenner declares:

1. I am the attorney of record for Defendant Shalom Ifrah.
2. Defendant does not drive, cook, or use electronics during these Holidays. Being with his family would make it easier and more meaningful to celebrate.
3. During Mr. Ifrah's time in Israel, he will be residing at 37 Sdertot Ha'Atzmaut, Bat Yam Floor 5 Apartment 11 Postal Code: 5939524
4. Mr. Ifrah is leaving from LAX on September 18<sup>th</sup>, 2025, to and from Tel Aviv, by way of Vienna. He arrives at LAX on October 16<sup>th</sup>, 2025, by way of Vienna.
5. I have met and conferred with with Assistant United States Attorney Roger Yang, and he has no objection to the Court granting this request. Defendant plans to travel to Israel for the Jewish High Holidays. As he did last year, Defendant would like to observe the Jewish High Holidays with his family in Israel

I declare the above to be true and correct under, pursuant to the laws of the United States of America, this 25<sup>th</sup> day of June, 2025, at Encino, California.

\_\_\_\_\_  
David Kenner  
Attorney for Shalom Ifrah

1 **IT IS SO STIPULATED.**

2  
3  
4 \_\_\_\_\_/s/\_\_\_\_\_  
5 David Kenner  
6 *Attorney for Defendant*  
7 *Shalom Ifrah*

8 \_\_\_\_\_/s/\_\_\_\_\_  
9 Roger Yang  
10 *Assistant United States Attorney*

11  
12  
13 \_\_\_\_\_/s/\_\_\_\_\_  
14 **Carolina Valencia-Diaz**  
15 *Signature of Bond for Release,*  
16 *Acknowledgement of Changes to Conditions of Release*

17  
18 \_\_\_\_\_/s/\_\_\_\_\_  
19 **Yakoc Cohen**  
20 *Signature of Bond for Release,*  
21 *Acknowledgement of changes to Conditions of Release*

1 **IT IS APPROVED AND SO ORDERED.**

2  
3  
4 Dated: June 30, 2025

A handwritten signature in blue ink, reading "Carolyn K. Delaney", is positioned above a horizontal line.

CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE